

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JENNIFER ZERBATO, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ALLOVIR, INC., DIANA M. BRAINARD,
and VIKAS SINHA,

Defendants.

Case No. 1:24-cv-10152-DJC

CLASS ACTION

~~[PROPOSED]~~ ORDER AWARDING ATTORNEYS' FEES, EXPENSES,
AND REIMBURSEMENT TO LEAD PLAINTIFFS

WHEREAS:

A. On July 30, 2025, a hearing was held before this Court to determine, among other things, whether and in what amount to award: (1) Lead Counsel in the above captioned securities class action (the "Action") fees and litigation expenses; and (2) Lead Plaintiffs' reimbursements pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), relating to their representation of the Settlement Class;

B. The Court having considered all matters submitted to it, and it appearing that a notice of the hearing substantially in the form approved by the Court (the Notice) was sent to all reasonably identified Settlement Class Members; and that a Summary Notice of the hearing, substantially in the form approved by the Court, was published in *Globe Newswire*; and the Court having considered, among other things, whether and in what amount to award: (1) Lead Counsel in the Action fees and litigation expenses; and (2) Lead Plaintiffs' reimbursements pursuant to the PSLRA, relating to representation of the Settlement Class,

IT IS HEREBY ORDERED:

1. This Order incorporates by reference the definitions in the Stipulation and Agreement of Settlement dated April 14, 2025 (the “Stipulation”), and all capitalized terms not otherwise defined herein shall have the same meanings as set forth in the Stipulation. *See* ECF No. 69-1.

2. The Court has jurisdiction over the subject matter of the Action, and all matters relating to the Settlement, as well as personal jurisdiction over all of the parties and each of the Settlement Class Members.

3. Notice of Lead Plaintiffs’ Motion for Award of Attorneys’ Fees, Expenses, and Reimbursement to Lead Plaintiffs was given to all Settlement Class Members who could be identified with reasonable effort. The form and method of notifying the Settlement Class of the motion for attorneys’ fees and expenses satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure, the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(7), due process, and all other applicable law and rules, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

4. Lead Counsel is hereby awarded, on behalf of all Plaintiffs’ Counsel, attorneys’ fees in the amount of \$333,333 (which is 33 1/3% of the Settlement Fund), and payment of litigation expenses in the amount of up to \$18,281.36 which the Court finds to be fair and reasonable.

5. The award of attorneys’ fees and litigation expenses may be paid to Lead Counsel from the Settlement Fund immediately upon entry of this Order, subject to the terms, conditions,

and obligations of the Stipulation, which terms, conditions, and obligations are incorporated herein.

6. In making this award of attorneys' fees and payment of litigation expenses from the Settlement Fund, the Court has considered and found that:

(a) The Settlement has created a common fund of \$1 million in cash, which is a favorable result, and that Settlement Class Members who submit acceptable Claim Forms will benefit from the Settlement created by the efforts of counsel;

(b) The requested attorneys' fees and payment of litigation expenses have been reviewed and approved as fair and reasonable by Lead Plaintiffs, who have a substantial interest in ensuring that any fees paid to counsel are duly earned and not excessive;

(c) Lead Counsel undertook the Action on a contingent basis, and have received no compensation during the period in which the Action was litigated, and any fee and expense award has been contingent on the result achieved;

(d) The Action involves complex factual and legal issues and, in the absence of settlement, would involve lengthy challenging proceedings the resolution of which would be uncertain;

(e) Lead Counsel conducted the Action and achieved the Settlement with skillful and diligent advocacy;

(f) The amount of attorneys' fees awarded and expenses to be paid from the Settlement Fund are fair and reasonable and consistent with awards in similar cases;

(g) Notice was disseminated to putative Settlement Class Members stating that Lead Counsel would be submitting an application for attorneys' fees in an amount not to exceed 33 1/3% of the Settlement Fund, which includes accrued interest, and payment of litigation

expenses incurred in connection with the prosecution of this Action not to exceed \$100,000 and that such application also might include a request that Lead Plaintiffs be reimbursed their reasonable costs and expenses directly related to their representation of the Settlement Class.

(h) No Settlement Class Member objected to the Settlement or Lead Counsel's application for attorneys' fees and litigation expenses.


7. In accordance with the PSLRA, the Court also awards Lead Plaintiffs \$5,000 (\$2,500 each) for costs and expenses directly related to their representation of the Settlement Class.

8. Any appeal or challenge affecting this Court's approval of the attorneys' fees, expense application, or award of costs and expenses to Lead Plaintiffs in the Action, shall in no way disturb or affect the finality of the Judgment entered with respect to the Settlement.

9. Exclusive jurisdiction is retained over the subject matter of this Action and over all parties to the Action, including the administration of the Settlement.

10. In the event that the Settlement is terminated or does not become final or the Effective Date does not occur in accordance with the terms of the Stipulation, this order shall be rendered null and void to the extent provided by the Stipulation and shall be vacated in accordance with the Stipulation.

DATED this 30th day of July, 2025


HONORABLE DENISE CASPER,
UNITED STATES DISTRICT
COURT JUDGE